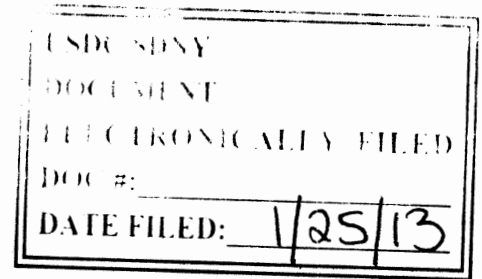


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BY EMAIL

January 25, 2013

Re: *Certain Underwriters at Lloyd's, London v. Convergys Corporation, et al.*, 12-cv-8968 (JMF)

The Honorable Jesse M. Furman
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Dear Judge Furman:

We represent Plaintiff Certain Underwriters at Lloyd's, London, Syndicates 623 and 2623 ("Beazley") in the above-captioned matter. We write in response to the Court's Order dated January 11, 2013, to inform the Court that after further investigation, we have determined that each of the "Names" in the Lloyd's Syndicates involved in this litigation does not satisfy the diversity jurisdiction amount in controversy requirement.

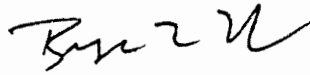
For these purposes, we assume the amount in controversy is equal to the insurance policy limit of \$20 million. *See Certain Underwriters at Lloyd's of London v. Illinois Nat'l Ins. Co.*, 2012 WL 4471564, at *5 (S.D.N.Y. Sept. 24, 2012); *Cheung v. Union Cent'l Life Ins. Co.*, 269 F. Supp. 2d 321, 323-34 (S.D.N.Y. 2003). Therefore, for a "Name" to meet the amount in controversy threshold of \$75,000, the "Name" must be responsible for at least 0.375% of the \$20 million limit. There are more than 1,000 "Names" in Syndicates 623 and 2623. Dozens of the individual "Names" do not satisfy the \$75,000 diversity jurisdiction amount in controversy requirement.

The Honorable Jesse M. Furman

-2-

Based on the foregoing, Beazley believes the Court lacks subject matter jurisdiction and remand of this action to New York Supreme Court is appropriate. 28 U.S.C. § 1447(c).

Respectfully submitted,

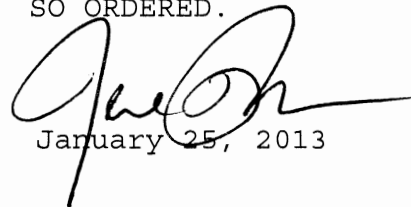


Bryce L. Friedman

cc: Robin L. Cohen, Esq.
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Michael N. DiCanio, Esq.
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Defendants shall submit a response to this letter no later than February 1, 2013, indicating whether they consent to remand or showing good cause why this Court has subject matter jurisdiction.

SO ORDERED.



January 25, 2013